



Mayor Teresa Ann Isaac

LEXINGTON - FAYETTE URBAN COUNTY GOVERNMENT
Department of Law

March 24, 2006

Ms. Beth O'Donnell
Executive Director
Public Service Commission
211 Sower Boulevard
P.O. Box 615
Frankfort, Kentucky 40602-0615

RECEIVED

MAR 27 2006

PUBLIC SERVICE
COMMISSION

Re: Case No. 2005-00534
(Alltel Merger)

Dear Ms. O'Donnell:

Please find enclosed herewith for filing an original and 10 copies of the Lexington-Fayette Urban County Government's Supplemental Data Requests in the referenced matter. Please contact me should you have any questions pertaining to the same.

Yours truly,

David J. Barberie
Corporate Counsel

ENC

DJB/let476

HORSE CAPITAL OF THE WORLD

200 East Main Street

Lexington, KY 40507

(859) 258-3500

Fax: (859) 258-3538

www.lfucg.com

COMMONWEALTH OF KENTUCKY
BEFORE THE PUBLIC SERVICE COMMISSION

RECEIVED
MAR 27 2006
PUBLIC SERVICE
COMMISSION

In the Matter of:

APPLICATION FOR APPROVAL OF THE)
TRANSFER OF CONTROL OF ALLTEL) CASE NO.
KENTUCKY, INC. AND KENTUCKY ALLTEL, INC. AND FOR) 2005-00534
AUTHORIZATION TO GUARANTEE)
INDEBTEDNESS)

**LEXINGTON-FAYETTE URBAN COUNTY
GOVERNMENT'S SUPPLEMENTAL DATA REQUESTS**

Comes now the Lexington-Fayette Urban County Government (the "LFUCG"), by counsel and pursuant to the Public Service Commission's pending Scheduling Order in this matter, and submits its Supplemental Data Requests to Alltel Kentucky, Inc., Kentucky Alltel, Inc., Alltel Communications, Inc., Alltel Holding Corp., Valor Communications Group, and Alltel Holding Corporate Services, Inc. (collectively referred to herein as the "Applicants") to be answered in accord with the following:

(1) In each case where a request seeks data provided in response to a staff request, reference to the appropriate request item will be deemed a satisfactory response.

(2) Please identify the company witness who will be prepared to answer questions concerning each request.

(3) These requests shall be deemed continuing so as to require further and supplemental responses if the company receives or generates additional information within the scope of these requests between the time of the response and the time of any hearing conducted hereon.

(4) If any request appears confusing, please request clarification directly from counsel for the LFUCG.

(5) To the extent that the specific document, workpaper or information as requested does not exist, but a similar document, workpaper or information does exist, provide the similar document, workpaper, or information.

(6) To the extent that any request may be answered by way of a computer printout, please identify each variable contained in the printout that would not be self evident to a person not familiar with the printout.

(7) If the company has objections to any request on the grounds that the requested information is proprietary in nature, or for any other reason, please notify counsel for the LFUCG as soon as possible.

(8) For any document withheld on the basis of privilege, state the following: date; author; addressee; indicated or blind copies; all persons to whom distributed, shown, or explained; and, the nature and legal basis for the privilege asserted.

(9) In the event any document called for has been destroyed or transferred beyond the control of the company state: the identity of the person by whom it was destroyed or transferred, and the person authorizing the destruction or transfer; the time, place, and method of destruction or transfer; and, the reason(s) for its destruction or transfer. If destroyed or disposed of by operation of a retention policy, state the retention policy.

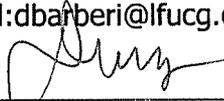
SUPPLEMENTAL DATA REQUESTS

1. Please refer to your response to LFUCG Initial Request for Information No. 11 and identify, list and fully describe as many “. . . of the many ways in which the Commonwealth’s public will benefit from entities’ wireline-focused management team and sound capital structure” as your are able to.
2. Please refer to your response to LFUCG Initial Request for Information No. 27(a).
 - a. Where are the Kentucky-based applicant’s respective customer service center(s) located?
 - b. Do the Kentucky-based applicants perform financial service operations locally or are the performed out-of-state? Please provide a percentage breakdown of the work performed locally versus out-of-state, if possible.
3. Please refer to your response to LFUCG Initial Request for Information No. 39(a)-(c). Please provide the information requested. If the Applicants are not able to do so, please provide as much of the information as possible in summary form.
 - a. Are the Applicants able to provide the LFUCG its monthly bills in an electronic form? If so, are they willing to do so?
4. Please refer to your response to LFUCG Initial Request for Information No. 40(a). If the Kentucky-based employees expend more time on the services listed in this response going forward in time, is it the Applicant’s expectation that the ratepayers should bear all of the costs attributable to said employees? If so, what is the basis for this expectation? If not, how should these costs be broken-out and treated?

Respectfully submitted,

LEXINGTON-FAYETTE URBAN
COUNTY GOVERNMENT
Department of Law
200 East Main Street
Lexington, Kentucky 40507
(859) 258-3500
E-Mail: dbarberie@lfucg.com

BY:



David J. Barberie
Corporate Counsel
Leslye M. Bowman
Director of Litigation

CERTIFICATE OF SERVICE

I hereby certify that an original and ten (10) copies of the Lexington-Fayette Urban County Government's Initial Requests for Information were served by first class U.S. Mail delivery, postage prepaid, to Beth O'Donnell, Executive Director, Public Service Commission, P.O. Box 615, 211 Sower Boulevard, Frankfort, Kentucky 40602-0615; furthermore, it was served by mailing a copy by first class U.S. Mail delivery, postage prepaid, on the following, all on this the 24th day of March, 2006.

Hon. Amy Dougherty
Public Service Commission
P.O. Box 615
211 Sower Boulevard
Frankfort, Kentucky 40602-0615

Hon. Dennis Howard, III, and
Hon. Lawrence W. Cook
Assistant Attorney Generals
Office of the Attorney General
Utility & Rate Intervention Division
1024 Capital Center Drive
Suite 200
Frankfort, Kentucky 40601-8204
dennis.howard@ag.ky.gov

Mark Overstreet, Esq.
Stites & Harbison PLLC
421 West Main Street
P.O. Box 634
Frankfort, Kentucky 40602-0634
moverstreet@stites.com

Daniel Logsdon
Kentucky Alltel, Inc.
130 West New Circle Road
Suite 170
Lexington, Kentucky 40505

Steve Mowery
ALLTEL Communications, Inc.
One Allied Drive
P. O. Box 2177
Little Rock, Arkansas 72203-2177

Don Meade, Esq.
Priddy, Isenberg, Miller & Meade, PLLC
800 Republic Building
429 West Muhammad Ali Blvd.
Louisville, Kentucky 40202
dmeade@pimmlaw.com

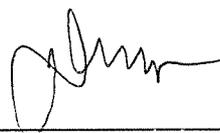
Jonathon N. Amlung
Attorney at Law
AMLUNG Law Offices
616 South 5th Street
Louisville, Kentucky 40202
info@amlung.com

Bethany Bowersock
Southeast Telephone Company
106 Scott Avenue
P.O. Box 1001
Pikeville, Kentucky 41502
beth.bowersock@setel.com

Douglas F. Brent, Esq.
Stoll, Keenon, Ogden, PLLC
2650 AEGON Center
400 West Market Street
Louisville, Kentucky 40202
douglas.brent@skofirm.com

John E. Selent, Esq.
Dinsmore & Shohl, LLP
1400 PNC Plaza
500 West Jefferson Street
Louisville, Kentucky 40202
john.selent@dinslaw.com

James H. Newberry, Jr., Esq.
Wyatt, Tarrant & Combs, LLP
250 West Main Street
Suite 1600
Lexington, Kentucky 40507-1746
jnewberry@wyattfirm.com



ATTORNEY FOR LEXINGTON-FAYETTE
URBAN COUNTY GOVERNMENT